

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LAS AMERICAS IMMIGRANT
ADVOCACY CENTER; AMERICAN
GATEWAYS; and THE COUNTY OF EL
PASO, TEXAS,
Plaintiffs,

v.

Cause No. 1:23-cv-1537

STEVEN C. MCCRAW, in his official
capacity as Director of the State of Texas
Department of Public Safety, and BILL
HICKS, in his official capacity as District
Attorney for the 34th District,
Defendants.

CARL STARR'S COMPLAINT IN INTERVENTION

Carl Starr files this complaint in intervention under a party plaintiff individual.

The Original Lawsuit
Plaintiffs sued defendants alleging SB 4 is unconstitutional.

Intervenor's Cause of Action/ 28 USC 1331
Preemption re the Supremacy Clause Article VI, Section 2, of the U.S. Constitution. SB 4 violates
the Supremacy Clause because it attempts to regulate matters that are exclusively reserved for the
federal government. This is argument Starr made in Starr's 2006 Operation Linebacker suit.

Damages
If defendants prevail Intervenor suffers a loss broken settlement agreement and suffers SB4 eg
unconstitutional stops and searches as a Hispanic without legal authority. Please take judicial
notice of El Paso Times url link. 1

Prayer;
WHEREFORE Carl Starr requests the Court grant Intervention and Declare that S.B. 4 is
unlawful in its entirety; Preliminarily and permanently enjoin Defendants from enforcing S.B. 4;
Grant any other and further relief that this Court may deem fit and proper.

1

<https://www.elpasotimes.com/story/news/immigration/2017/05/22/2006-settlement-might-help-county-sb-4-fight/101862418/>

Respectfully Submitted,
Email carlstarr@gmail.com

 1-2-24

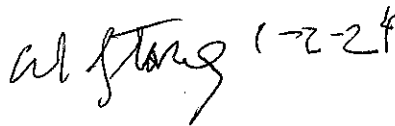
Electronic Signed \ Carl Starr \ 1-2-24

Carl Starr, General Delivery, Fort Hancock, Texas 79839

Mailing Address: Carl Starr 815 La Cruz Dr, El Paso, Texas 79902

I Certify under penalty or perjury the forgoing is true and correct and further certify the forgoing was faxed/emailed to the parties.

Electronic Signed: \ Carl Starr \ 1-2-24

 1-2-24

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LAS AMERICAS IMMIGRANT
ADVOCACY CENTER; AMERICAN
GATEWAYS; and THE COUNTY OF EL
PASO, TEXAS,
Plaintiffs,

v.

Cause No. 1:23-cv-1537

STEVEN C. MCCRAW, in his official
capacity as Director of the State of Texas
Department of Public Safety, and BILL
HICKS, in his official capacity as District
Attorney for the 34th District,
Defendants.

ORDER ON INTERVENTION AND COMPLAINT

The court having considered Carl Starr's Motion to Intervene and Complaint in Intervention.

GRANTS IT and _____

OR

GRANTS IT with limitation Intervenor only receives copies/service of all filings and motions.

Judge _____

Date _____